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519 8TH AVENUE, 25TH FLOOR
NEW YORK, NY 10018
866.WLG.ROUP • warren.law

September 9, 2022

VIA E.C.F.

Hon. Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 1007

**RE: New Oriental Enterprise v. Mission Critical Solutions,
Case No. 20-CV-2327**

Dear Judge Vyskocil,

This office represents the defendants, Mission Critical Solutions, LLC, and Mark-Anthony Phillips ("Defendants"), in the above-referenced matter. Defendants respectfully request an extension of time, from September 15, 2022, to September 29, 2022, to file a motion to dismiss the Second Amended Complaint. Defendants note that: (a) this is their first request for an extension of time to file such a motion; and (b) they asked Plaintiff's counsel for his consent but did not receive a response by the time of this application.

Defendants respectfully request an extension of time because the undersigned counsel and firm were recently retained by Defendants. Defense counsel, therefore, requires additional time to familiarize with this matter, including, but not limited to: the procedural history, the underlying facts, this Court's orders, and the applicable law. Furthermore, additional counsel will be added to the case and motions requesting admission pro hac vice will be filed shortly. Consequently, a brief extension of time, from September 15, 2022, to September 29, 2022, would afford the Defendants and their counsel sufficient time to file their motion to dismiss.

Lastly, Defendants are unclear whether this application would affect the current October 4, 2022 status conference. Defendants, thus, defer to the Court with respect to such fact.

Thank you for your attention to this matter.

Respectfully submitted,

Forge Marquez /S/
Managing Associate

Cc: VIA ECF
Jack Dweck, Esq. (asa2fly@aol.com)

Defendant's request for an extension of time is **GRANTED**. The Status Conference scheduled for October 4, 2022 is adjourned to October 11, 2022 at 12:00 PM in Courtroom 18C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York. **SO ORDERED.**

Date: 9/12/2022
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge